Remarks

In response to the Office Action mailed on January 25, 2007, the Applicants respectfully request reconsideration in view of the following remarks. In the present application, independent claims 1, 7, 15, and 18 have been amended. The claims have been amended to clarify that the call request comprises a Session Initiated Protocol (SIP) request and that the call request further comprises an Internet Protocol (IP) address and an e-mail address of the Internet-enabled device. Support for these amendments may be found in Figure 2 and in paragraphs 29 and 31 in the Specification. No new matter has been added.

Claims 1, 3-10, 12-15, 17, and 18 are pending in the application. In the Office Action, claims 1, 3-10, and 12-14 are rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Claims 1 and 3-6 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Lang (US 6,897,678) in view of O'Neal (US 6,640,242, hereinafter O'Neal '242). Claims 7-9, 12-15, and 17-18 are rejected under 35 U.S.C. § 103(a) as being unpatentable over O'Neal (US 6,990,094, hereinafter O'Neal '094) in view of O'Neal '242 and Lang. Claim 10 is rejected under 35 U.S.C. § 103(a) as being unpatentable over O'Neal '094, O'Neal '242, and Lang, and further in view of Wiener (US 6,324,264).

Applicants' Statement of the Substance of the Interview

A telephonic interview between Applicants representative Alton Hornsby III (Registration No. 47,299) and the Examiner was held on March 12, 2007 to discuss a proposed amendment to independent claim 7 in view of the cited references O'Neal '094, O'Neal '242, and Lang. In the interview, the Applicants' representative pointed out that the combination of the cited references fails to disclose transmitting a SIP request containing origination and destination telephone numbers from a server over a secure IP network to a telecommunications network, wherein the call request further comprises an IP address and an e-mail address of an

Internet-enabled device. The Examiner agreed that the proposed amendment to claim 7 was sufficient to overcome the cited references.

Claim Rejections - 35 U.S.C. §112

Claims 1, 3-10, and 12-14 are rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. In particular, the claims are rejected for reciting a second database having stored therein a call request which comprises an IP address of the Internet enabled device. As noted above, independent claims 1 and 7 have been amended to delete the references to the second database. Therefore, it is respectfully submitted that the rejection of these claims under 35 U.S.C. § 112, first paragraph be withdrawn. Claims 3-6 and 8-10 depend from amended claims 1 and 7, respectively, and thus recite at least the same features. Therefore, the rejection of these claims under 35 U.S.C. § 112, first paragraph should also be withdrawn.

Claim Rejections - 35 U.S.C. §103

Claims 1 and 3-6

Claims 1 and 3-6 are rejected as being unpatentable over Lang in view of O'Neal '242. The rejection of these claims is respectfully traversed.

Amended independent claim 1 specifies an apparatus for allowing a calling party to initiate a telephone call from an Internet-enabled device. The apparatus includes a server operative for receiving an originating telephone number and a destination telephone number in response to a command from the Internet-enabled device, wherein at least the destination telephone number is imported from a database external to the server, generating a call request comprising a Session Initiation Protocol (SIP) request, and transmitting the request from a non-secure data network to a telecommunications network via a secure Internet Protocol network to

request the telecommunications network to establish a connection between the originating telephone number and the destination telephone number, wherein the database external to the server is in communication with the non-secure data network and wherein the server stores the call request, the call request comprising an Internet Protocol address and an e-mail address of the Internet-enabled device.

It is respectfully submitted that the combination of Lang and O'Neal '242 fails to teach, disclose, or suggest all of the features specified in amended independent claim 1. For example, the aforementioned combination fails to disclose transmitting a SIP request containing origination and destination telephone numbers from a server over a secure IP network to a telecommunications network, wherein the call request further comprises an IP address and an e-mail address of an Internet-enabled device.

Lang discusses establishing long distance call connections via a packet network from a personal communications assistant. A call completion application accepts call connection information (such as originating and destination telephone numbers) from a subscriber, formulates a call connection request message based on the information, determines the availability of a packet network connection and if necessary establishes said connection, and sends the call connection request message to a long distance server provider server using the packet network connection. See Fig. 2B and Col. 3, line 14 through Col. 4, line 25. Lang however, fails to disclose transmitting a SIP request containing origination and destination telephone numbers from a server over a secure IP network to a telecommunications network, wherein the call request further comprises an IP address and an e-mail address of an Internet-enabled device.

O'Neal '242, relied upon for allegedly curing the deficiencies of Lang, discusses an integrated message system for receiving and storing telephonic and data messages through telephony-centric and data-centric networks, respectively. The message system receives voice calls through the Internet using an Internet voice connectivity application and provides outgoing telephone lines for enabling outbound telephone calls. See Col. 2, lines 30-61. O'Neal '242 however, fails to disclose transmitting a SIP request containing origination and destination telephone numbers from a server over a secure IP network to a telecommunications network, wherein the call request further comprises an IP address and an e-mail address of an Internet-enabled device.

Based on the foregoing, the combination of Lang and O'Neal fails to teach, disclose, or suggest each of the features specified in amended claim 1. Therefore, amended claim 1 is allowable and the rejection of this claim should be withdrawn. Claims 3-6 depend from amended claim 1, and are thus allowable for at least the same reasons. Therefore, the rejection of claims 3-6 should also be withdrawn.

<div align="center">Claims 7-9, 12-15, and 17-18</div>

Claims 7-9, 12-15, and 17-18 are rejected as being unpatentable over O'Neal '094 in view of O'Neal '242 and Lang. The rejection of these claims is respectfully traversed.

Amended independent claims 7, 15, and 18 recite similar features as amended independent claim 1 discussed above. It is respectfully submitted that the combination of O'Neal '094, O'Neal '242 and Lang fails to teach, disclose, or suggest all of the features specified in amended independent claims 7, 15, and 18. For example, the aforementioned combination fails to disclose transmitting a SIP request containing origination and destination telephone numbers from a server over a secure IP network to a telecommunications network.

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O'Neal '094 discusses web initiated telephony between telephonic devices. A computer coupled to a data network selects telephone devices for communication and provides the selection to a web server. The web server commands telephony servers to call the selected telephone devices to establish a connection between them. The telephony servers are connected to the data network and a local telephone network. Voice information from the telephony servers are converted using H.323 protocol for transmission over the data network. See Col. 3, line 53 through Col. 4, line 32. O'Neal '094 however, fails to disclose transmitting a SIP request containing origination and destination telephone numbers from a server over a secure IP network to a telecommunications network.

As discussed above with respect to amended claim 1, neither Lang or O'Neal '242, alone or combination, teaches, discloses, or suggests at least transmitting a SIP request containing origination and destination telephone numbers from a server over a secure IP network to a telecommunications network. Therefore, amended claims 7, 15, and 18 are allowable and the rejection of these claims should be withdrawn. Claims 8-9, 12-14, and 17 depend from amended claims 7, 15, and 18, and are thus allowable for at least the same reasons. Therefore, the rejection of these dependent claims should also be withdrawn.

<p style="text-align:center;">Claim 10</p>

Claim 10 is rejected as being unpatentable over O'Neal '094, O'Neal '242, and Lang, and further in view of Wiener. The rejection of this claim is respectfully traversed.

Claim 10 depends from amended independent claims 7 and thus specifies at least the same features. As discussed above with respect to amended claim 7, the combination of O'Neal '094, O'Neal '242, and Lang fails to teach, disclose, or suggest all of the features specified in this claim. For example, the aforementioned combination fails to disclose at least transmitting a

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SIP request containing origination and destination telephone numbers from a server over a secure IP network to a telecommunications network. Therefore, claim 10 is allowable over the aforementioned combination for at least these reasons.

Wiener, relied upon in the Office Action for allegedly curing the deficiencies of O'Neal '094, O'Neal '242, and Lang, discusses a method of establishing a communications call via the Internet (a non-secure network) to a PSTN (see Figure 1). User interfaces are provided for selecting a party, making a call request which includes a destination telephone number for calling the selected party, and for entering an originating number (see Figures 5 and 6). Wiener however, fails to disclose least transmitting a SIP request containing origination and destination telephone numbers from a server over a secure IP network to a telecommunications network. Wiener also fails to disclose a call request which includes an Internet Protocol address and an e-mail address. Therefore, based on the foregoing, claim 10 is allowable over the combination of O'Neal '094, O'Neal '242, Lang, and Wiener and accordingly, the rejection of this claim should be withdrawn.

Conclusion

In view of the foregoing amendments and remarks, this application is now in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is invited to call the Applicants' attorney at the number listed below.

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No fee is believed due beyond the fee for continued examination. However, please charge any additional fees due or credit any overpayment to Deposit Account No. 50-3025.

Respectfully submitted,

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